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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case No. 18-md-02843-VC-JSC

**DECLARATION OF MATTHEW
MONTGOMERY IN SUPPORT OF
DISCOVERY LETTER REGARDING
DEFENDANT FACEBOOK INC.'S
AMENDED RESPONSES AND
OBJECTIONS TO PLAINTIFFS' FOURTH
SET OF INTERROGATORIES**

I, Matthew Montgomery, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am Of Counsel for the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 18-md-02843-VC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them. This declaration is made in support of Discovery Letter Regarding Defendant Facebook Inc.’s Amended Responses and Objections to Plaintiffs’ Fourth Set of Interrogatories.

3. Attached hereto as Exhibit A is a true and correct copy of an excerpt of the July 16, 2020, Plaintiffs’ Fourth Set of Interrogatories to Defendant Facebook, Inc.

4. Attached hereto as Exhibit B is a true and correct copy of an excerpt of the September 11, 2020 email sent by Matthew Montgomery to Facebook Inc.’s counsel.

5. Attached hereto as Exhibit C is a true and correct copy of an excerpt of the November 20, 2020, Defendant Facebook Inc.’s Amended Responses and Objections to Plaintiffs’ Fourth Set of Interrogatories.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Davis, California.

DATED: January 22, 2021

/s/ Matthew Montgomery
Matthew Montgomery